
 Attachments can contain viruses that may harm your computer. Attachments may not display correctly.

Curtis P. Cheyney

From: Curtis P. Cheyney
To: John S Spadaro
Cc: Marino, John; Nicholas E. Skiles
Subject: Eames Discovery

Sent: Thu 1/5/2006 4:43 PM

Attachments:  Eames - Letter to Spadaro.DOC(31KB)

John: Please see my attached letter regarding discovery.

Curtis P. Cheyney, III
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January 5, 2006

VIA Electronic Mail

John S. Spadaro, Esquire
Murphy Spadaro & Landon
1011 Centre Road, Suite 210
Wilmington, DE 19805

Re: Eames v. Nationwide Mutual Insurance Company

Dear Mr. Spadaro:

Documents in response to your clients' initial production request will be delivered to you by Federal Express tomorrow. As you will see, the documents are designated as confidential pursuant to the Court's Stipulated Protective Order. We will provide any further responses, as appropriate, on or before January 11 as recommended in Discovery Master Semple's January 4 letter.

We also note that Discovery Master Semple's January 4 letter indicates that he included certain categories of documents in his recommendations because "Plaintiffs' counsel specifically identified them at oral argument as the types of documents that Plaintiffs believe exist." If you or your clients have any information relating to the existence or possible existence of any specific documents within these categories, we again ask that you immediately provide such information to aid in any further searches that may be appropriate. Alternatively, if you and your client have no such information, please indicate so.

The documents being delivered to you tomorrow are separated by blue sheets. You will also see that many of the emails have one or more attachments. Attachments within an email are separated by a yellow sheet.

Very truly yours,

Curtis P. Cheyney, III

CPC/cb

cc: John P. Marino, Esq.
Nicholas E. Skiles, Esq.

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